

CHAPTER VIII

PROCUREMENT

This chapter covers procurement requirements, procedures, and best practices that are not covered in the general administrative manual. For information concerning the procurement of a project administrator and public facilities contractors, please refer to the general administrative manual. This chapter covers the procurement of your housing inspector, lead-based paint risk assessor, rehabilitation and demolition contractors, lead paint abatement contractors, asbestos inspectors, and asbestos contractors.

HOUSING INSPECTOR

For any housing rehabilitation program to be successful, a city or county must have a good housing rehabilitation inspector. The importance of having good rehabilitation inspection services cannot be underestimated. DED has established specific procedures that must be followed when soliciting a housing inspector.

- 1) **Method of Soliciting a Rehabilitation Inspector:** The procedure for soliciting a rehabilitation inspector must comply with the competitive proposal method of procurement outlined in the CDBG general administrative manual. Grantees must solicit an adequate number of sources to obtain at least three bids. A request for proposals (RFP) must be prepared. The request should include the five minimum qualifications listed in item 3 below. An example of an RFP is contained in Exhibit 40.

Since rehabilitation inspectors are not easy to find, solicitation should include mailing the RFP to all known area inspectors and publishing the RFP in a newspaper of widest circulation in the area. Please note, DED will not approve a waiver of the competitive procurement requirements unless both of these methods are used and documented.

The grantee should meet and develop a list of 7 – 10 individuals in the area that meet one or more of DED's minimum inspector qualifications that are itemized in paragraph #3 below. The grantee's list should consist of firms or individuals in the area that have been contractors, or taught vocational education classes, or union apprentice classes, or worked in similar government rehabilitation programs. The direct solicitation procurement list must consist of more than three firms or individuals. The objective of the procurement process is to achieve a minimum of three bids or proposal, which means a grantee has to develop a list to directly solicit more than just three individuals or firms. A grantee should be able to meet and have a fruitful discussion that will produce a sufficient number of persons and firms within a 60 – 75 mile radius of the project site that meets one of DED's inspector's qualifications for the purpose of developing a list for direct solicitation.

- 2) **Criteria for Contract Award:** When actually choosing an inspector, a grantee should look for personal and professional qualities that are necessary to provide high quality inspection services. These generally include the following:
- a) **Preparation Of Preliminary Work Write-Ups** - Inspectors should have the time and physical ability to thoroughly investigate a house for problems and potential problems. The inspector should note any existing violations of DED Housing Quality Standards and of local codes. In order to identify these problems, the inspector should have previous experience as a contractor working on housing rehabilitation projects or as an inspector on previous housing rehabilitation projects. The inspector should be familiar with DED Housing Quality Standards or Section 8 Housing Quality Standards, and the cities local building and housing codes. The inspector should be willing to take the time and effort to expose hidden problems that may exist in the house.
 - b) **Communication** - The inspector should be personable and have the ability to effectively communicate with both the contractor and occupant of the house. An inspector should know how to resolve conflicts between the homeowner and contractor and should know construction terminology.
 - c) **Specification Writing** - The inspector should be willing to take the time to write clear and precise specifications for each house. Contractors bidding on vague specifications may interpret specifications as they choose and their bids will reflect differences in the scope and quality of work. The inspector should be willing to measure out the dimension of all work to be accomplished. Specifications should indicate the quantity of materials, the quality of materials, the exact location in the house the materials are to be installed, and the methods by which the materials are to be installed. The project administrator could, in some cases, provide assistance in structuring the work write-ups into a bid package. The inspector must also be knowledgeable concerning the procedures for lead and asbestos compliance and abatement and integrating lead reduction activities into the rehabilitation process. Demolitions require work specifications for bid to avoid utility accidents, asbestos testing and removal compliance, and state waste and debris disposal compliance. Non-compliance can result in fines to the contractor, grantee, and possibly the project administrator from the agencies with jurisdiction over those compliance areas.
 - d) **Construction Monitoring** - The inspector should have the time and capability for ensuring that the contractor accomplishes the work as indicated in the specifications. In order to ensure that high quality work is being accomplished, the inspector should, on the average, be willing to be on the site at least every other day. The frequency of inspection will vary according to the work accomplished and the reliability of the contractor. Contractors who have previously exhibited high quality workmanship do not need to be inspected as often as contractors who have a poor work record.
 - e) **Lead Paint** - Each grantee must have a lead risk assessment conducted for each targeted house by a DHSS licensed risk assessor. This risk assessor inspector must report the results of this inspection to the City and owner. The lead risk assessor may or not be the rehabilitation inspector. As was indicated in Chapter 1, there are distinct advantages to the risk assessor and inspector being the same person, including: less confusion for the homeowner, streamlining the preliminary inspection process to include the risk

assessment, and limiting the number of meetings necessary with the homeowner, city, and other parties. However, many inspectors do not want to bear the risk or expense of being a risk assessor.

- 3) **DED's Housing Inspector Qualifications and Approval Process:** Grantees are required to have their inspectors approved by DED before rehabilitation or inspection funds will be released for the project. Inspectors must have one of the five following minimum qualifications:
- a) One year in a building construction supervisory position (must have coordinated different building trades in a construction project or has been a City Code Inspector for one year enforcing nationally approved building and electric codes); and has taken an approved course in specification writing and cost estimating, or submits specifications for the grantee's first house that are reviewed and approved by DED;
 - b) Has been a housing inspector on a CDBG project in the past, and performance was determined to be acceptable;
 - c) Has at least one year's formal training as a housing rehabilitation inspector and submits specifications for the first house that can be approved by DED;
 - d) Has at least one year experience as a rehabilitation inspector in other Federal programs and submits specifications for the first house that can be approved by DED;
 - e) Has been a building trades or vocational education instructor in a high school or post-high school institution approved by the State

Any combination of the above or equivalent experience will also be considered.

NOTE: DED will not approve any inspector whose performance on previous grants has been consistently deficient, regardless of qualifications. Consistently deficient is defined as averaging more than one health and safety standard or major construction omission per house.

Inspector Approval Process:

- 1) **Approval Process for New Inspectors:** For inspectors that have never done rehabilitation inspection work in the CDBG program, a grantee must send a letter, under the signature of the mayor or presiding commissioner, and the proposed inspector's resume to DED that request approval of the person as the grantee's neighborhood development project housing rehabilitation inspector. The resume must show that the proposed inspector meets at least one of the state CDBG program's five inspector qualifications. DED will review the statement in accordance with our criteria and respond with a written approval or disapproval of the grantee's request.
- 2) **Approval Process for Existing CDBG Rehabilitation Inspectors:** Grantees must request the approval of inspectors that have in the past or are currently providing rehabilitation services for housing rehabilitation projects funded by the State of Missouri CDBG Program. Our program staff will review their past performance on the CDBG projects. We will review the

last nine houses that have been monitored by DED staff where your proposed inspector has provided the rehabilitation inspection services. Our past performance review will be based on the number of major deficiencies identified in the monitoring letters and any legitimate complaints from past grantees and homeowners.

We will send a letter that approves or disapproves of the grantee's choice for project inspector to the chief elected official of the grantee.

Please note that grantees should be advised that even though an inspector has been approved for a specific project, they are not automatically approved for future projects, even within the same community. Each grant award requires a new review and approval.

- ★ **Best Practice:** Housing inspectors should generally not have more houses than they can inspect at one time. A general rule of thumb is that an inspector should not have more than four open CDBG Neighborhood Development grants to inspect for at one time, unless the inspector has additional qualified staff that can assist. Grantees may also want to request that the inspector provide a list of inspection equipment available to accomplish the task. Suggested items include: ladder, tape measure, electric circuit tester, a CO tester, a reliable vehicle, a good computer, specification writing software, and a digital camera, among others. Grantees may also want to consider an inspector that carries errors and omissions insurance or is bondable. Although this insurance is expensive, it can provide additional valuable financial resources for major problems that could occur.

LEAD-BASED PAINT RISK ASSESSOR

The job of the lead paint risk assessor is strictly regulated by the Lead Bureau of the Missouri Department of Health and Senior Services. All grantees must procure a lead-based paint risk assessor to conduct risk assessments on all pre-1978 houses that are not exempt. The specific manner in which the risk assessor interacts with the lead inspector is outlined in Chapter V of this manual.

The important thing to note here is that the risk assessor must be procured from the list provided by the Missouri Department of Health & Senior Services and that our competitive proposal procurement procedures must be followed. Grantees are encouraged to directly solicit as many providers as possible, within reasonable distance of the project, from the "Licensed Risk Assessor List" supplied by the Missouri Department of Health and Senior Services at www.dhss.mo.gov/Lead/. Their list is changed on a monthly basis, so use their most recent list. Since only licensed risk assessors must be procured, procurement through a newspaper advertisement is not required, but the grantee may advertise in addition to direct solicitation.

A copy of an example of a Request for Proposals for lead risk assessment services can be found at Exhibit 41. As part of the criteria for soliciting a lead risk assessor, grantees should look for professionals that have experience working with housing rehabilitation programs. Since the risk assessor will need to frequently communicate with the housing inspector, it is essential that the risk assessor be realistic about what work is possible under the CDBG costs limits. Grantees may also want to consider using a lead risk assessor or firm that carries errors and omissions insurance or is bondable.

- ★ **Best Practice:** The cost of preparing the risk assessment and report up-front should be on a per unit basis to minimize the cost of taking tests that are not required to accomplish a risk assessment. Since testing technology continues to change, we believe that the cost per unit up-front is generally more appropriate than the cost per test. The initial risk assessment report should be able to be accomplished in a predictable number of trips.

However, on the back end of the rehab, the cost of clearance testing may require more than one trip, since the contractor conducting lead reduction activities may or may not pass the lead dust clearance levels the first time around. Therefore, a lump sum may not be appropriate for per unit clearance testing. Grantees should consider requesting an amount per visit to eliminate excessive clearance testing costs.

PROCUREMENT OF REHABILITATION CONTRACTORS

1) Methods of Procurement

In selecting housing rehabilitation contractors, two basic approaches may be implemented. In the first approach, the grantee selects the contractor following our program's procurement procedures. Here, Federal regulations specified by PL 103-355 applies. A second approach involves the property owner selecting the contractor. Here, the owner's contractor must still meet the grantee's contractor qualification requirements and work specifications. The owner's contractor's bid must also be within 10% of the grantee's inspector's rehab costs estimate. If the grantee selects the contractor through the bid process, then the grantee is the procuring party. However, if the grantee only provides a list of reliable contractors for the owners to choose a contractor, price estimates, and other forms of technical assistance during the procurement process; the owner is the procuring party and Federal procurement rules do not apply.

- a) **Grantee Procurement:** In all cases where the grantee is procuring housing rehabilitation or demolition contractors, a newspaper advertisement must be placed in a local newspaper of widest circulation a minimum of once per year. Equal opportunity language as indicated in the general administrative manual is required for all bid advertisements.
- ★ **Best Practice** is to advertise twice each year to obtain contractors who do rehabilitation during specific seasons, and post advertisement notices at local lumberyards, if allowed.

Contract Expected over \$25,000: Publicly advertised sealed competitive bids are required for contracts over \$25,000 and the lowest, most responsible bidder must be awarded a contract. Cities should obtain a minimum of three bids for rehabilitation contracts. (See Procurement Chapter in the general administrative manual for formal bidding procedures if the house cost is over \$25,000). However, the Missouri CDBG program thoroughly discourages a grantee from proceeding with any rehab project that is estimated to exceed our \$21,000 cost limit.

Contract Expected Below \$25,000: Grantees may award a bid for contracts below \$25,000 to any "qualified" contractor bidding on a project that the grantee considers to be the most advantageous for the project. The criteria for selection of contractors must clearly be stated in the city's rehabilitation guidelines and must include cost criteria. Other criteria that may be used include: the capacity of the contractor to carry out the project, number of other

houses awarded, and other reasonable criteria established by the grantee in their rehabilitation guidelines.

- In cases where the lowest of three bids is not selected, then a cost estimate must guarantee the reasonableness of a bid.
- Where more than three bids are obtained, at least two additional bids can be used to justify the contract award.

If three bids cannot be obtained, a cost estimate prepared by the rehabilitation inspector may be substituted for one of the bids.

A single bid may be accepted if it can be demonstrated that the price is reasonable in terms of the inspector's cost estimate. In cases where a cost estimate is used to justify the reasonableness of the single bid, the sole bid must be within 10% of the inspector's cost estimate.

Owner Procurement: In owner procurement, the city must verify that the contractor is "qualified" and is capable of doing the work specified in the work write-up. The grantee must prepare a cost estimate to justify the reasonableness of the bid. In cases where the grantee has obtained a number of bids for the owner to choose, and the owner chooses a bid that is not within 10% of the estimate, the owner must pay the difference between the estimate and the selected bid.

2) **Solicitation of Contractors**

Regularly advertising for rehabilitation bids can become costly, time consuming, and can result in project delays. Grantees are encouraged to develop a "qualified contractor bid list" to use to directly solicit written bids from that list of contractors. To develop their qualified contractor list, a grantee must advertise at least once annually for rehabilitation contractors. After the responding contractors successfully complete the grantees contractor qualification criteria, they should be placed on this list and be directly solicited to bid during each round of housing bids. The grantee must ensure that the list contains MBE and WBE contractors in the area that meet the grantee's qualification criteria.

The grantee's required contractor qualifications should be included in the advertisement and in the solicitation request for contractors. This may include, among other things, the number of years in business, the ability to establish a letter of credit, references submitted, equipment owned, insurability, and others desired by the grantee. Once a list of several contractors is developed, establishing contractor qualification may be taken out of the bid process. Bids can be directly solicited from contractors on the list without advertising. Grantees may also use qualified contractors on a list on a rotating basis in order to maximize contractors working on the job. Grantees may prepare pre-bid cost estimates to provide guidance to contractors concerning their ability to carry out a project within a specified dollar amount, provided that such an estimate is non-negotiable. Otherwise, the grantee's inspector's cost estimate must be used strictly for the bidding process, and only bids within 10% of that estimate may be awarded the contract.

Federally Debarred Contractors: Grantees must contact the CDBG Labor Standards Officer prior to the award of any public facility, housing, or demolition contract in order to clear the proposed contractor. Before the grantee can sign a contract with a proposed contractor, the grantee must ensure that the contractor is not on the federal listing of contractors that are unable to perform work under a federally sponsored project.

3) **Incentives to Attract Contractors (Best Practices)**

The best incentive to attract good contractors is a well-run program. Programs with good reputations will attract good contractors. Specific elements that contractors typically desire are as follows:

- a) Having a **clear-cut division of roles and responsibilities** as outlined in Chapter I of this manual. The contractor needs to be aware of both the homeowner's responsibilities and their own. Contractors must only perform the work in the rehab contract specifications. Any additional work must be in a signed change order approved by the inspector. The grantee, inspector, and administrator are not responsible to pay for work that is not in the contract specification or an approved change order. This responsibility must be made clear to both the property owner and contractor. Property owners must deposit their matching funds with the grantee prior to the commencement of the rehab work to ensure payment to the contractor in a timely manner.
 - b) Writing **clear and concise specifications**. If a contractor does not know how to bid a particular item, they may not turn in a bid. Have performance manuals readily available.
 - c) Make **timely payments**. Payments not made on time cost contractors time and money. Contractors should be paid within one week of receipt of a bill, approved by all parties, to provide a good contractor incentive.
 - d) Use **qualification and availability based selection**. If you have an inspector that makes reliable cost estimates, then set the bid price up front and selects the contractor based upon qualification for the particular job. If contractors know that they have a good chance of being regularly selected and that they will not have to waste time submitting bids for contracts that will not be awarded, they will stick with the grantee's project.
 - e) In areas where there is a lack of qualified contractors. Assist contractors **in job scheduling**. Many contractors are not trained planners and businesspeople. If your inspector and administrator have these skills, they can assist the contractor in scheduling the contractor's work, not just the CDBG work, to assure that the contractor does not schedule an excessive workload and cause project delays.
 - f) Provide a **referral list of well-qualified subcontractors**.
 - g) Provide **training** for contractors in the various building trades.
- ### 4) **Risk Management – Best Practices for Determining the Suitability of Contractors for Projects during the Pre-Rehabilitation Period**

The previous paragraph covered developing a “qualified” contractor list. This section explains one procedure grantees can develop to qualify contractors and to match contractors with appropriate projects. This section will also identify methods grantees may take to minimize the risk of not successfully completing the rehabilitation of a house. Each measure that a grantee takes to reduce the risk of an unsuccessful project and to screen out unqualified contractors may result in increasing the cost of the project. On the other hand, not taking measures to reduce the risk during this phase of the project, may lead to unqualified contractors that will create numerous problems for the homeowner, inspector, and administrator; and, in the worst case scenario, may lead to ineligible costs that will need to be repaid to DED by either the contractor or the grantee. Please note that the provisions suggested below are no guarantee that every risk will be eliminated and that they should never be substituted for good inspection and contract management practices by the grantee.

- a) **Contractor Qualification Procedure:** This procedure specifies a method that may be used to screen contractors. Grantees may use this procedure, but may also devise their own procedures. Grantees must have some minimum criteria for what they believe are qualified contractors.
 - (1) Contractor Application form completed and filed with grantee (See Exhibit 42)
 - (2) Furnish Certificates of Insurance
 - (3) Review of Documentation by Grantee, Administrator, Inspector for past performance, and other relevant information
 - (4) Verification of Information on Application Form:
 - i) Credit:
 - (a) Suppliers
 - (b) Sub-Contractors
 - (c) Lenders
 - ii) Review of Previous Work:
 - (a) On-site
 - (b) Telephone previous customers, **reference check**
 - iii) Better Business Bureau
 - iv) Consumer Protection Office
 - (5) Inclusion or rejection on Bidders Probationary List;
 - (6) Review of First Job by Rehabilitation Board/Staff;
 - (7) Acceptance of Rejection to Permanent List.

- b) **Criteria for Qualification:** Grantees may include contractors on their list for any type of work, specific types of work, or based upon the size of job. Criteria for rejecting contractors from the list should include: poor credit references, consumer complaints, poor past performance on CDBG projects and other publicly funded projects, and a lack of tools and personnel to complete projects. Contractors with no experience at all should not be considered. Grantees may also want to classify contractors on their list as to types of work for which they are best suited based on their qualifications and experience.

Criteria to consider could include the following:

- (1) Time in Business: Generally, the greater the experience of the contractor hired, the less risk the grantee is taking in hiring that contractor.

CONTRACT SIZE	Minimal	Better	Recommended
\$0 – 3,000	2 weeks	6 months	1 year
\$3,000 - \$15,000	6 months	1 year	2 years
\$15,000 - \$30,000	1 year	2 years	3 years

- (2) Type of Previous Work: Contractors should have experience in the same type of work requested by the grantee. This means, for a rehabilitation contractor, contractors should have previous rehabilitation work, as opposed to new construction or commercial buildings, etc. Generally, contractors should have accomplished, at a minimum, five times the dollar amount of similar contract work as requested by the grantee. Similar work may be past work with windows, carpentry, roofing, electrical, plumbing, etc. Some sources recommend a minimum of 30 times the experience as the total contract work requested. For example, if the grantee desires ten times the amount of past work in a variety of trades and the inspector's estimate is \$10,000 for the project, then the contractor should have a minimum of \$100,000 in previous similar contract work experience.
- (3) Experience of Contractor Personnel: Both the contractor and the persons working for the contractor must be experienced. Carpenters should have a minimum of one to three years' experience with five to ten years recommended. Supervisors and managers should have a minimum of two to five years' experience with ten years recommended.
- (4) Current Work Load: Grantees must take into account a contractor's current workload before awarding additional projects to any one contractor. The history of the contractor in completing past projects should be taken into account. The ability of contractors to expand their business to complete more rehabs should also be considered. Grantees should request information concerning the total contract load for a one-year period. If the contractor's current load is more than 50 – 75% above the previous year, then the grantee may consider eliminating the contractor from bidding until their load is reduced.

- (5) Minimum Cost Coverage: At the bare minimum, the contractor should show that they have enough cash to carry at least 20% of the project cost. Grantees seeking additional risk reduction may want to reduce their risk by requiring that the contractor submit a letter of credit for 15 – 25% of the contract price, or even more. The amount requested in the letter of credit may be reflected in the increased cost of the contract. This will allow the grantee to effectively manage the project's work load to successfully complete their CDBG project in a timely manner.
- (6) In-depth Interviews with past clients: Grantees with additional time on their hands may take the extra steps to research their contractors thoroughly by conducting in-depth interviews with a number of past clients of the contractor.
- (7) Ability to carry higher insurance liability limits or is bondable: Although contractors with these insurance qualifications are rare, they usually will limit the grantees risk on their projects to a minimal level. Contractors that are bondable will usually cost more than those that are not. Grantee should not require a bond as this will result in an excessive cost to the project.

5) Structuring Bid Responses

Itemized Bids: Grantees requesting bids from contractors can require submission of a lump sum bid or require that contractors submit separate bids for each item. When bids are submitted as a lump sum, the grantee has less control over its ability to negotiate changes in the contract at the time bids are awarded and has less opportunity to find the reason for major differences in bid amounts. Although the cost of preparing a bid proposal may be greater, requiring itemized bids may allow grantees to avoid rebidding projects that come in over the estimated bid amount. Exhibit 43 is a contractor proposal form requiring itemized bids. The actual bid forms that can be used can be found in Exhibit 12.

Alternative Deductibles: In an effort to remain flexible in the bidding process for construction activities, the grantee may set in place alternative deductibles. These items must be clearly marked as such and in the event of bids received over budget, may be “deducted” from the scope of the project. Alternate deductibles should not include items necessary for the house to meet DED's HQS. Alternate deductibles can also be structured to deduct work items that would make the house meet DED's lower Health and Safety HQS, rather than the Livability HQS.

Negotiation: Negotiation with a bidder is not allowed if the contract is publicly bid and the bid price is over \$25,000. For contracts less than \$25,000, the grantee may not negotiate with a sole bidder, but must consider all bidders after deducting items necessary to bring the bid within budget when there is more than a sole bidder. Every bidder must receive the same consideration. Negotiation with all bidders must be clearly documented in the files.

Addendum Procedure: If during the procurement process, changes are made in the scope of the project, then an addendum must be provided to **all** interested bidders not later than 72 hours prior to the bid submission deadline. If this period is not possible, the deadline period may be delayed. All bidders obtaining bid documents must be made aware of all addendum(s) in order not to interrupt the procurement procedure.

6) Bid Award

The criteria allowed for awarding bids was discussed above. Exhibit 44 is a sample bid tabulation form that a grantee can use for each round of housing rehabilitation bids. Exhibits 45 and 46 are also sample form documents that can be used for a bid awards. The “Bid Acceptance” form, Exhibit 45, can be used in the case where the homeowner is choosing the contractor.

The criteria for acceptance of the award must be explained where it is not within 10% of the contract amount. For example, if the bid were more than 10% above the contract amount, the city would provide an amount of funds under item 2 that must be paid by the homeowner.

Exhibit 46, the “Notice of Award” form, is the notice that is provided to the selected contractor. Please note that the grantee is requiring that the contractor submit a letter of credit to the city in the amount of \$2,500 before a “Notice to Proceed” can be issued. Also note that a current Certificate of Insurance must be provided before the “Notice to Proceed” is issued. Although contractors may be insured at the time they make the qualified bidders list, the city must make sure that their insurance is current, before work may proceed.

Exhibit 45 considers the case where the homeowner is selecting the contractor. These documents may be changed to encompass any risk control methods the grantee employs, or to change the name of the owner to the grantee to provide for bid acceptance.

High Bids or No Bids

When all bids are higher than the rehab inspector’s cost estimate, the grantee may:

- a) Ask the owner to pay the difference between the low bid and the rehab inspector’s cost estimate; or,
- b) Seek other sources of funds to pay the difference, i.e., MHDC, weatherization, or Rural Development funds; or,
- c) Deduct some livability items and rehabilitate the home to meet DED’s health and Safety HQS Standards; or,
- d) Rebid the house as a Health and Safety or Livability house; or,
- e) Allow the property owner to find a contractor who will do the work for an amount that is within 10% of the inspector’s cost estimate based on that contractor’s written bid to the property owner.
- f) If all of the above fails, then the grantees must exercise their “walk-away” policy option in their housing rehabilitation guidelines.

LEAD-BASED PAINT ABATEMENT CONTRACTORS

In cases where a grantee must procure a lead-based paint abatement contractor, solicitation must be made from the list of currently licensed contractors provided by the Missouri Department of Health and Senior Services. That list is available at: www.dhss.mo.gov/Lead/

The procurement procedure is the same as that for procuring the rehabilitation contractor; however, the cost estimate must be made as a collaborative effort between the rehabilitation inspector and lead risk assessor. Separate procurement of a lead abatement contractor also means that the housing inspector and/or risk assessor must provide coordination of work between the rehab contractor and the lead abatement contractor. Coordination here is very important to avoid excessive relocation costs. For example, an abatement contractor may remove a window, the rehabilitation contractor may be installing a window, and the abatement contractor may also be responsible for ensuring that clearance requirements are met. The owner should accomplish these tasks as quickly as possible to ensure re-occupancy in a timely manner.

- ★ Best Practice: Ensure that all lead reduction activity work is coincidental to the rehabilitation work, unless the work absolutely requires the procurement of lead abatement contractor.

ASBESTOS INSPECTOR AND CONTRACTOR PROCUREMENT COMPLIANCE

When rehabilitation and demolition work requires the grantee to hire a licensed asbestos inspector and/or licensed asbestos contractor, the grantee must procure them from the Missouri Department of Natural Resources current list of licensed asbestos contractors and “building inspectors” at: www.dnr.mo.gov/alpd/apcp/Asbestos.htm

When procuring the licensed asbestos building inspector, follow the DED competitive proposal procurement method. When procuring a licensed abatement contractor, procure them in the same manner as you would procure a housing rehabilitation contractor.

If you have questions pertaining to DNR’s lists, please contact them at their Air Pollution Control Program at: 1-800/361-4827 or 573/751-4817

Please Note: All CDBG project demolitions must have an asbestos inspection.